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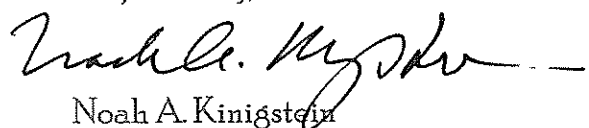
Honorable Margo K. Brodie
United States District Court Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201
By ECF

Re: United States of America and New York State ex. rel., Orlando
Lee, Melville Luckie and Luz Gonzalez v. Northern Metropolitan
Foundation for Health Care, Inc., Northern Manor Multicare
Center, Inc. and Northern Adult Day Health Care Program
Docket No.: Cv-13-4933 (MKB)

Honorable Judge Brodie:

I represent the relators, Melville Luckie and Luz Gonzalez. I am writing to jointly request an enlargement of time for all parties to file their objections to the Magistrate Judge Orenstein's Report and Recommendation, dated March 12, 2019 (Document 105). I am making this application with the consent of defendants' counsel. The reasons for the request are that co-counsel for the plaintiffs is scheduled to be out of the country from March 20, -March 27, 2019, on a holiday that was planned months ago, and his partner has recently left the partnership to take another job, requiring Mr. Sadowski to assume the responsibility for the firm's caseload. In addition, I am a solo practitioner and I am preparing for hearings and trials, and completing work that must be completed in the next two weeks. Mr. Hess, the attorney for the defendants has time pressure issues as well, specifically, preparing submissions in a large multi-party arbitration. We are asking for a three week enlargement, of time, until April 16, 2019, to file our objections. Thank you for your consideration of this matter.

Respectfully,


Noah A. Kinigstein